

As an ISP that provides fixed wireless broadband and operates in ISM bands of 902-928mhz, 2402-2480mhz, 5.2ghz, and 5.8ghz, We have a significant interest to in this docket. We serve over 9000 square miles of rural community. We would like the following changes for rural use of unlicensed spectrum in rural areas:

Relaxation of Antenna certification requirement for Part 15b devices. A simpler and more logical method of certification is to certify a device with maximum gain and type of antenna (ie: 24dbi Grid Parabolic with 10 degree beam width or better, or 13dbi 120 degree sector panel). This would allow unlicensed providers to deliver service using cost effective parts, allow faster deployments to more people.

An increase in power level (max dbm EIRP) for Part 15b devices in sub 1ghz bands. This will allow us to go through trees better and deliver service to more customers. Since outdoor part 15b devices are rare in rural areas, the problems of users causing interference with each other is not as likely.

Ability to use non-used spectrum without license (secondary user status). We would like the ability to use unused spectrum with a simple post install filing with an online database. There is large amounts of unused spectrum in rural areas, we could effectively use these bands to deliver internet data service to many users. Since Internet can deliver just about any media format, this would provide Phone (voip type service, see vonage.com) Video and information services to many people who currently lack such services.